

1 A. Depending on what it pertains to.

2 Q. A friend said to you that he or she got lucky,  
3 would you find that offensive?

4 A. Not that, no.

5 Q. Next sentence you state Ronnie would describe  
6 when Susan came home drunk and wanted to have sex, and  
7 he didn't want to with her drunk. Did he tell you on  
8 more than one occasion that his wife, Susan, had come  
9 home drunk and wanted to have sex with him, and he did  
10 not want to?

11 A. One time.

12 Q. One time?

13 A. Yes.

14 Q. Have any of your friends ever told you in their  
15 personal conversations that their husband or their  
16 significant other had tried to have sex with them when  
17 they were drunk, and they did not want to have sex with  
18 them?

19 A. No.

20 Q. Did you say anything to Mr. Robertson when he  
21 made that comment?

22 A. No.

23 Q. And I forgot to ask you. When Mr. Farrar said  
24 that he got lucky, did you say anything to him?

25 A. No.

1 Q. You then indicate that his favorite story was him  
2 in the pool and his wife's friend getting into the pool  
3 naked and him being uncomfortable because his wife was  
4 there. What exactly did he say?

5 A. That he was mowing the grass, and he decided to  
6 get into the pool. And his wife was home with one of  
7 her friends and got into the pool. And his wife's  
8 friend got into the pool with them naked, and his wife  
9 came out by the pool and he was embarrassed.

10 Q. Did he tell you that he and his wife's friend did  
11 anything in the pool?

12 A. No.

13 Q. Okay. All he described to you was the fact that  
14 he went into the pool, and his wife's friend got naked  
15 and joined him in the pool?

16 A. Yeah.

17 Q. He didn't describe any type of sexual act,  
18 correct?

19 A. No.

20 Q. In fact, at any point in time did Mr. Robertson  
21 describe a sexual act in the workplace?

22 A. I'm sorry. Repeat that again.

23 Q. It is true that at no point in time did  
24 Mr. Robertson describe a sexual act while he was  
25 working, correct?

1 A. No, I don't think so.

2 Q. In fact, no Wal-Mart manager or supervisor ever  
3 described a sexual act in the workplace, correct?

4 A. Do you mean like having sex with a partner or --

5 Q. I mean, rather than making general comments like  
6 you've set forth in this statement, there was no  
7 Wal-Mart manager or supervisor that graphically  
8 described a sexual act, correct?

9 A. Not graphically, no.

10 Q. That is correct, right?

11 A. Yes.

12 Q. How many times did Mr. Robertson tell you that  
13 story about his wife's friend getting naked and joining  
14 him in the pool?

15 A. About a good three times.

16 Q. You then state that Nathan would talk about his  
17 girlfriend and her body parts. Can you tell us  
18 specifically what it was that Nathan said?

19 A. I vaguely remember him talking about her butt and  
20 her breasts.

21 Q. What'd he say?

22 A. She had a big butt and no breasts.

23 Q. Anything more descriptive or graphic than that?

24 A. No.

25 Q. How many times did he say that?

1 A. It's about twice.

2 Q. You then indicate that Donny Peterson would tell  
3 stories about parties his band had and his brother at  
4 one time dating Nathan's girlfriend. What does that  
5 refer to? What do you mean by that?

6 A. I remember that. Donny's brother was dating  
7 Nathan's girlfriend, and they were talking about how  
8 many times Donny's brother would have sex with Nathan's  
9 then girlfriend and some of the stuff they did at  
10 parties, as far as the drinking and how late they'd be  
11 out and stuff.

12 Q. You found it offensive for Mr. Peterson to  
13 discuss the case that he had a party at his home, and  
14 they were drinking and out late?

15 A. I'm sorry. I found --

16 Q. I'm asking you whether you found it personally  
17 offensive that Mr. Peterson told you that when he was  
18 out of work he would have parties wherein he stayed up  
19 late and drank?

20 A. No.

21 Q. When Mr. Peterson would state that his brother  
22 was having sex with Nathan's girlfriend, did he discuss  
23 that in a more graphic or descriptive manner than that,  
24 or did he just say that he was having sex with his  
25 girlfriend?



1 A. He said that he had sex with them or -- pretty  
2 much.

3 Q. Okay. All he said is that he was having sex with  
4 his girlfriend. He didn't describe the sexual act,  
5 correct?

6 A. No.

7 Q. That's correct?

8 A. Yes.

9 Q. Have we discussed everything that you're relying  
10 on in that statement regarding Donny Peterson?

11 A. Yes.

12 Q. Your next sentence you state: At one point I  
13 told all of them no one cared about their sex life with  
14 wives or partners; is that correct?

15 A. Yes.

16 Q. That was the one and only time that you expressed  
17 any opposition to the events described in your  
18 statement, correct?

19 A. Yes.

20 Q. Did they respond when you made that statement?

21 A. They just laughed.

22 Q. Did you say anything in response to their  
23 laughter?

24 A. No.

25 Q. And then finally you indicate that Ronnie, John,

1 Nathan, and Donny would impersonate a maintenance man by  
2 the name of Mr. Bill; is that correct?

3 A. Yes.

4 Q. And you indicate that Mr. Bill had a tendency to  
5 grab himself?

6 A. Yes.

7 Q. Okay. When they would impersonate Mr. Bill, what  
8 did they do?

9 A. They grabbed their crotch.

10 Q. Did they say anything?

11 A. Sometimes they made comments.

12 Q. Such as?

13 A. Oh, nothing really. In general, I want to get a  
14 hammer and grab their crotch. It's just something they  
15 do.

16 Q. Did you say anything when they did that?

17 A. I told them they were gross.

18 Q. Did they say anything?

19 A. No.

20 Q. Did they laugh?

21 A. Yes.

22 Q. Did you say anything when they laughed?

23 A. No.

24 Q. How many times did they do that?

25 A. Quite a few times.

1 Q. What's your best approximation?

2 A. Normally, whenever Mr. Bill worked, so I'm  
3 assuming about, to the best of my knowledge, three times  
4 a week, four times a week. Sometimes he didn't even  
5 have to be there.

6 Q. That was three to four times a week over the  
7 course of four months?

8 A. Yes.

9 Q. You indicate with regard to this statement  
10 relating to them impersonating Mr. Bill that usually  
11 there were two or more managers present?

12 A. Yes.

13 Q. Am I correct in my understanding that when  
14 Ronnie, John, Nathan, and Donny would grab their crotch  
15 to impersonate Mr. Bill, they were joking amongst  
16 themselves?

17 A. I believe so.

18 Q. Okay. In other words, they weren't talking to  
19 you. They were joking amongst themselves, and you  
20 happened to be present, correct?

21 A. Yes, I was there.

22 Q. I'm sorry?

23 A. Yes, I was present.

24 Q. And you told us earlier that about the  
25 conversation that you had with Mr. Robertson in January

1 of 2005 wherein he asked you what you were going to do  
2 to him at the year-end meeting, right?

3 A. Yes.

4 Q. Adding that to everything we just discussed with  
5 regard to your statement, have we now discussed  
6 everything you're relying on in support of your claim of  
7 sexual harassment?

8 A. I believe so.

9 Q. When Mr. Peterson would discuss the fact that his  
10 brother was dating Nathan's girlfriend and having sex  
11 with her, there were others present aside from yourself,  
12 correct?

13 A. Yes.

14 Q. Was he talking directly to you, or just you  
15 were -- he was in your presence?

16 A. In my presence.

17 Q. When Nathan said his girlfriend had a big butt  
18 and no breasts, was he talking directly to you or in  
19 your presence?

20 A. In my presence.

21 Q. When Ronnie would tell the story about his wife's  
22 friend getting naked and joining him in the pool, was he  
23 talking directly to you or just in your presence?

24 A. Well, he was directing it to me, and I was there.  
25 You could go either way.



1 Q. Were there others present as well?

2 A. Yes.

3 Q. When Ronnie said that his wife came home drunk  
4 and wanted to have sex with him but he didn't want to  
5 have sex with her, were there others present when he  
6 made that comment, or was that a one-on-one discussion  
7 between you and him?

8 A. No others were present.

9 Q. When Mr. Farrar said that he had, quote, got  
10 lucky, end quote, was that a discussion between you and  
11 him one-on-one, or were there others present?

12 A. Others present.

13 Q. When Mr. Farrar stated that his wife came out of  
14 the bathroom and wanted to have sex with him, was that a  
15 discussion you had one-on-one, or were there others  
16 presents as well?

17 A. Others present.

18 Q. Would dirty jokes -- strike that.

19 In communications -- strike that.

20 The communication meetings wherein dirty  
21 jokes were occasionally told, how many people were  
22 present at those meetings?

23 A. Six to seven people.

24 Q. How often were those communication meetings held?

25 A. Normally every day.

1 Q. You never said that you found those dirty jokes  
2 offensive, correct?

3 A. Personally.

4 Q. I'm sorry?

5 A. Personally. You asked me if they were offensive.  
6 I said they were offensive in the workplace but  
7 personally, no.

8 Q. Do you understand that my question was a little  
9 bit different? When you were in these meetings and you  
10 heard these dirty jokes, you never expressed to anybody  
11 that you found them offensive, correct?

12 A. I never said anything.

13 Q. It is true that the only conduct that was  
14 directed specifically at you was when Mr. Robertson  
15 asked you about your breast implants on two to three  
16 occasions asking you how they felt, and whether he could  
17 see them? That's one thing, right?

18 A. Yes.

19 Q. When he looked at your breasts on approximately  
20 three occasions and said he enjoyed the view, correct?

21 A. Yes.

22 Q. When he told you approximately four to eight  
23 times that you looked nice in tight sweaters, right?

24 A. Yes.

25 Q. And when you had your conversation with him in